1 Martin Sabelli, State Bar No. 164772
   Law Offices of Martin Sabelli
2 500 Liberty Street
   San Francisco, CA 94114-2829
3 Telephone: (415) 298-8435

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5 Attorney for Defendant MAURICE BIBBS

6   UNITED STATES DISTRICT COURT

7   NORTHERN DISTRICT OF CALIFORNIA

8

9 UNITED STATES OF AMERICA   )   No. CR 07-0336-01 WHA
)
10   Plaintiff,   )   **DEFENDANT'S REQUEST**
)   **RE ACCEPTANCE OF**
11   v.   )   **CONDITIONAL PLEA**
)
12 MAURICE BIBBS,   )
)
13   )
         Defendant.   )
14   )
)
15 _____)

16

17 On February 9, 2008, Maurice Bibbs entered a conditional plea of guilty to Count Two of

18 the Indictment in this matter. Mr. Bibbs did so pursuant to a plea agreement that

19 conditioned the plea upon this Court's acceptance of the joint sentencing recommendation

20

21 reflected in the plea agreement.

22   Mr. Bibbs hereby requests that this Court accept the conditional plea by imposing

23 the joint sentencing recommendation of 96 months. This joint recommendation reflects

24

25 the nature of the offense alleged as well as the post-arrest conduct of Mr. Bibbs.

26 **OBJECTION TO CHARACTERIZATION OF MR. BIBBS AS A MEMBER OF**

27 **THE "EDDY ROCK GANG"**

28

1   Mr. Bibbs has one exception to the facts contained in the Presentence Investigation

2 Report. Mr. Bibbs denies that he is a member of the "Eddy Rock gang," as asserted in

3 paragraph 14 of the Report. The Report contains no information supporting this assertion.

4
**REQUEST FOR JUDICIAL RECOMMENDATION RE DESIGNATION BY
5 BUREAU OF PRISONS**

6
    Finally, Mr. Bibbs has recently become the father of a baby boy, who lives with his
7
8 mother in San Pablo. He therefore requests that this Court recommend to the Bureau of

9 Prisons that it attempt to designate Mr. Bibbs to a facility as close as possible to the San

10 Francisco Bay Area in order to facilitate contact between him and his son.

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12
Date: June 17, 2008
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                                    _____/s/_____
14   Martin Sabelli
                                     Attorney for Maurice Bibbs
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DEFENDANT'S REQUEST RE ACCEPTANCE OF CONDITIONAL PLEA
No. CR 07-0336-01 WHA